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October 11, 2024

By ECF

Hon. John G. Koeltl, U.S.D.J.
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 14A
New York, New York 10007

*Application granted
without prejudice & any
subsequent application to
unseal. go direct.
for 6/10/24
U.S.D.-
10/15/24*

Re: ***Jane Doe v. Russell Wendell Simmons, Docket No. 24-cv-01043-JGK***
Letter Motion regarding Filing Exhibits Under Seal

Dear Judge Koeltl,

We represent the defendant, Russell Wendell Simmons ("Defendant"), in the above-referenced action. We write pursuant to 6.A.2 of Your Honor's Individual Practices and Rules to request permission to file exhibits that will be attached to our upcoming renewed Motion for Judgment on the Pleadings (the "Exhibits") under seal, and in some cases, with redactions.

The Exhibits will consist of (i) the Defendant's deposition transcript ("Deposition Transcript"), and; (ii) the following documents relating to the Defendant's domicile:

- Screenshot of the public database reflecting that Mr. Simmons is not registered to vote in New York;
- Mr. Simmons's sale of his most recently held U.S. property (which was sold in 2021);
- Mr. Simmons's Indonesian driver's license;
- Mr. Simmons's California non-resident tax filing;
- Mr. Simmons's Indonesian bank account;
- Mr. Simmons's Indonesian health insurance policy and its subsequent renewal;
- Invoices from Mr. Simmons's recent doctor's visits in Indonesia;
- Mr. Simmons's current, permanent Indonesian retirement visa (Dkt. #52-1), and several preceding temporary, limited stay Indonesian visas; and
- A scan of Mr. Simmons's passport showing these visa stamps (collectively, the "Domicile Documents").

We are requesting to file the Exhibits under seal to protect the Plaintiff's anonymity and our client's sensitive personal information. We attempted to confer with Plaintiff's counsel, in accordance with Your Honor's Individual Practices and Rules, and they have not responded to our outreach.

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With Your Honor's approval, we will file the Deposition Transcript under seal and unredacted. Plaintiff has filed a copy of the Deposition Transcript under seal after her request was granted by Your Order (Dkt. #64). With Your Honor's approval, we will file the Domicile Documents under seal and redacted where necessary, in conformity with 6.A.1 of Your Honor's Individual Practices and Rules.

Respectfully submitted,

/s/ David M. Fish

David M. Fish